

Exhibit P

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT
DEPARTMENT OF THE
TRIAL COURT

BRYCE ZUNDEL and DIANE ZUNDEL,)

Plaintiffs,

vs.

AMERILURE, INC., et al.,

Defendants.)

) CIVIL ACTION NO.:

) 22-2145

- - -

Deposition of WILLIAM E. LONGO, PH.D.,
taken on behalf of the Defendants, pursuant to
Notice, in accordance with the Massachusetts
Rules of Civil Procedure, before Louise
Griffith, Certified Court Reporter, at 6470 East
Johns Crossing, Suite 160, Johns Creek, Georgia,
on the 30th day of May, 2023, commencing at the
hour of 11:19 a.m.

<p style="text-align: right;">Page 182</p> <p>1 A Scheduling.</p> <p>2 Q Okay.</p> <p>3 A The PLM analysis is very tedious and long.</p> <p>4 By TEM, we have three different analysts all</p> <p>5 qualified to do that. Chrysotile was really up to</p> <p>6 one person in our lab, but now we're going to have</p> <p>7 three as we get --</p> <p>8 Q And the one person being Mr. Hess?</p> <p>9 A -- as we get people trained.</p> <p>10 Q Just want to make it clear. Clarify.</p> <p>11 A Yes.</p> <p>12 Q Mr. Hess is the one that's trained now?</p> <p>13 A He's the one that has been trained and has</p> <p>14 been doing this and has given a lot of insight on</p> <p>15 solving analytical issues.</p> <p>16 Q And you're training more people --</p> <p>17 A Yes.</p> <p>18 Q -- in PLM?</p> <p>19 A Correct.</p> <p>20 Q Okay. But TEM is -- doesn't require the</p> <p>21 same level of training. Fair?</p> <p>22 A It's fair in that it's not as, to me -- and</p> <p>23 I was an electron microscopy person. It is not as</p> <p>24 complicated as PLM.</p> <p>25 Q Okay. And the analyst for the TEM work was</p>	<p style="text-align: right;">Page 184</p> <p>1 A Correct.</p> <p>2 Q And a width of 1.5 microns?</p> <p>3 A Correct.</p> <p>4 Q And the structure says, bundle?</p> <p>5 A (Witness nods head.)</p> <p>6 Q What is bundle based on?</p> <p>7 A Based on the photograph.</p> <p>8 Q Okay. And we'll get to that in a minute.</p> <p>9 Well, let's look at it now.</p> <p>10 So it's the first photomicrograph in this</p> <p>11 section?</p> <p>12 A Yes.</p> <p>13 Q And is it your opinion that this is a</p> <p>14 bundle of tremolite?</p> <p>15 A If I was doing the analysis, I would call</p> <p>16 this a bundle. And I would still call it a bundle</p> <p>17 cause I can see little protrusions at the ends of</p> <p>18 these. So, yes, this is a bundle. But for a</p> <p>19 structure like this, you really need to be sitting at</p> <p>20 the microscope where you can, you know, focus more</p> <p>21 and go through different things. But even with what</p> <p>22 I have here, I would call it a bundle.</p> <p>23 Q Okay. Well, Mr. Motamedi had an</p> <p>24 opportunity to take different pictures of this</p> <p>25 bundle, right?</p>
<p style="text-align: right;">Page 183</p> <p>1 Mr. Motamedi?</p> <p>2 A Yes.</p> <p>3 Q Okay. And he works for you at MAS, right?</p> <p>4 A He has for a long time.</p> <p>5 Q And the count sheet indicates that there</p> <p>6 were two grids with a total of a hundred openings; is</p> <p>7 that right?</p> <p>8 A Correct.</p> <p>9 Q And are both grids in the same grid box?</p> <p>10 A Yes.</p> <p>11 Q And that's --</p> <p>12 A But different slots.</p> <p>13 Q Okay.</p> <p>14 A So they're individual with slots on them.</p> <p>15 But, you know, the grid boxes are labeled, obviously,</p> <p>16 and we keep them. So we have -- we'll save these</p> <p>17 grids until... I don't know.</p> <p>18 Q Okay. So Mr. Motamedi identified a total</p> <p>19 of two tremolite structures.</p> <p>20 You already said that, right?</p> <p>21 A Correct.</p> <p>22 Q And the first tremolite structure is noted</p> <p>23 on page 1 of 3 here. The numbering's in the bottom</p> <p>24 right-hand corner.</p> <p>25 And he recorded a length of 8.5 microns?</p>	<p style="text-align: right;">Page 185</p> <p>1 A Yeah. They'll need different pictures.</p> <p>2 Q This is the one he chose, correct?</p> <p>3 A Correct. It's fine. It's in focus.</p> <p>4 Q Okay.</p> <p>5 A And I can see what I need on it.</p> <p>6 Q Which is the protrusions?</p> <p>7 A Yeah. You can see little bumps at the end</p> <p>8 and you can see a light color on the side. That's a</p> <p>9 bundle. It's got parallel sides, it's greater than</p> <p>10 .5 microns in length, and it has an aspect ratio of</p> <p>11 greater than or equal to 5. So that's, that's a</p> <p>12 regulated tremolite bundle.</p> <p>13 Q And bundle versus fiber because of these</p> <p>14 protrusions?</p> <p>15 A Well, this is not a fiber. I mean, a</p> <p>16 tremolite, a tremolite fiber would be much smaller</p> <p>17 than that. So these are bundles with stacked-up</p> <p>18 fibers. You know, it's hard to see with TEM because</p> <p>19 when it gets dense like this, you can't see through</p> <p>20 it. It's a little bit clearer on the next one.</p> <p>21 Q Well, let's get to the next one in due</p> <p>22 course.</p> <p>23 A Sure.</p> <p>24 Q I just -- I'll get confused. I'm sure you</p> <p>25 won't, but --</p>

William Longo, Ph.D. - May 30, 2023

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CERTIFICATE

STATE OF GEORGIA:

COUNTY OF DEKALB:

I hereby certify that the foregoing transcript was taken down as stated in the caption, that the witness was first duly sworn, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 291 represent a true, correct, and complete transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case. The witness did reserve the right to read and sign the transcript.

This, the 8th day of June, 2023.

LOUISE GRIFFITH, CCR-B-2121
Certified Court Reporter

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